

COPY

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 3 Chief, Criminal Division
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11 AUG 11 AM 11:37
 CLERK OF DISTRICT COURT
 CENTRAL DISTRICT OF CALIF.
 LOS ANGELES
 BY:

FILED

12 Attorneys for Plaintiff
 13 UNITED STATES OF AMERICA

14 UNITED STATES DISTRICT COURT

15 FOR THE CENTRAL DISTRICT OF CALIFORNIA

16 CV11-06596 DMG(MANX)
 17 UNITED STATES OF AMERICA,

) NO. CV..

18 Plaintiff,

) VERIFIED

19 v.

) COMPLAINT FOR FORFEITURE

20 \$132,322.00 IN U.S. CURRENCY,

) [21 U.S.C. § 881(a)(6)]

21 Defendant.

) [D.E.A.]

22
 23
 24 The United States brings this claim against the defendant
 25 \$132,322.00 in U.S. currency (the "defendant currency"), and
 26 alleges as follows:

27 //

28 //

JURISDICTION AND VENUE

1
2 1. This is a civil forfeiture action brought pursuant to
3 21 U.S.C. § 881(a)(6).

4 2. This court has jurisdiction over the matter under 28
5 U.S.C. §§ 1345 and 1355.

6 3. Venue lies in this district pursuant to 28 U.S.C.
7 § 1395(b).

PERSONS AND ENTITIES

8
9 4. The plaintiff is the United States of America.

10 5. The defendant is \$132,322.00 in U.S. currency seized
11 from Adolph Robert Thornton, Jr. ("Thornton") on February 23,
12 2011, at the Los Angeles International Airport ("LAX"), in Los
13 Angeles, CA.

14 6. The interests of Thornton may be adversely affected by
15 these proceedings.

16 7. Plaintiff alleges that the defendant currency
17 represents or is traceable to moneys and negotiable instruments
18 furnished or intended to be furnished in exchange for a
19 controlled substance in violation of 21 U.S.C. § 841 et seq, or
20 were used or intended to be used to facilitate a violation of 21
21 U.S.C. § 841 et seq. As such, the defendant currency is subject
22 to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

23 8. The defendant currency was seized in this district on
24 or about February 23, 2011, by members of Group 3 of the Los
25 Angeles International Airport Narcotics Task Force ("LAX Group
26 3"). The defendant currency is currently in the custody of the
27 United States Marshals Service, where it shall remain subject to
28 this court's jurisdiction during the pendency of this action.

EVIDENCE SUPPORTING FORFEITURE

1
2 9. On or about February 23, 2011, at about 11:45 a.m.,
3 Los Angeles Sheriff's Department ("LASD") Detective Moore and
4 LASD Detective DeRuyter (the "detectives"), members of LAX Group
5 3, were on duty at LAX monitoring passengers exiting the
6 automatic doors between the US Airways and Southwest Airlines
7 baggage carousel area. The detectives observed a male (later
8 identified as Thornton) carrying a single carry-on bag (the
9 "carry-on bag") exit past the carousels. Detective Moore walked
10 along side Thornton, identified himself as a police officer and
11 asked Thornton from which city he was traveling. Thornton
12 appeared nervous with his hands visibly shaking; Thornton paused
13 and answered Memphis. Memphis is a known consumer location for
14 narcotics and Los Angeles is a known source city where narcotics
15 can be purchased. Detective Moore asked Thornton whether he
16 (Thornton) was in town for business or pleasure. Thornton
17 answered pleasure and that he (Thornton) was in Los Angeles to
18 see his girlfriend who was supposed to pick Thornton up at the
19 airport.

20 10. Detective Moore asked to see Thornton's
21 identification. Thornton provided a drivers license with a hole
22 punch covering the expiration year. When asked about the hole
23 punch, Thornton stated that law enforcement in Memphis punched
24 the hole in the license because Thornton had several outstanding
25 traffic warrants. Detective Moore asked Thornton whether
26 Thornton had ever been arrested and Thornton replied that he
27 (Thornton) had been arrested for possession of a concealed
28 firearm and cited for possession of marijuana.

1 11. Detective Moore asked Thornton whether Thornton was
2 traveling with any narcotics or large amounts of currency.
3 Thornton stated that he (Thornton) was traveling with two or
4 three thousand dollars, but did not know exactly how much. When
5 Detective Moore asked how it was possible that Thornton did not
6 know how much money he (Thornton) was traveling with, Thornton
7 did not offer an explanation and continued to appear nervous.

8 12. When asked whether there was any additional money or
9 any narcotics in the carry-on bag, Thornton assured the
10 detectives that there was not and that nobody had given him
11 (Thornton) anything to bring to Los Angeles.

12 13. Detective DeRuyter noticed a strong odor of marijuana
13 emanating from the carry-on bag. When asked again if there was
14 any currency or narcotics in the carry-on bag, Thornton assured
15 the detectives that there was nothing but clothing in the carry-
16 on bag.

17 14. Detective DeRuyter removed a tennis shoe from
18 Thornton's carry-on bag and found a bundle of \$100 bills under
19 the shoe's insole. Thornton stated that the shoe was his, but
20 the money did not belong to him (Thornton). However, Thornton
21 was unable to offer any explanation or reason why someone else
22 would hide money in Thornton's shoe.

23 15. Thornton accompanied the detectives to the LAX Group 3
24 office so that the detectives could further examine the carry-on
25 bag. The carry-on bag contained several other bundles of
26 currency hidden inside various shoes within the bag. When asked
27 how much money in total was in the carry-on bag, Thornton
28 responded that there was about \$80,000.00 and that the money

1 belonged to him (Thornton). Thornton had no response when asked
2 why he (Thornton) failed to tell the detectives about the
3 additional currency when the detectives originally spoke with
4 Thornton in the terminal. Likewise, Thornton did not have any
5 explanation for why he (Thornton) initially told the detectives
6 that the money Detective DeRuyter found in the insole of
7 Thornton's shoe (referenced in paragraph 14) did not belong to
8 him (Thornton).

9 16. When Thornton removed the shoes he (Thornton) was
10 wearing, Detective Moore found two additional bundles of money
11 underneath the shoes' insoles. Thornton also removed
12 approximately \$2,000.00 to \$3,000.00 in U.S. currency from his
13 pants pocket.

14 17. When asked why he (Thornton) was traveling with such a
15 large amount of money, Thornton replied that he (Thornton)
16 wanted to buy a car. However, Thornton was unable to identify
17 any specific vehicle which he (Thornton) wished to purchase, and
18 had not made any appointments with any vehicle sellers.
19 Furthermore, when asked why he (Thornton) would buy a car in
20 California and drive it back to Memphis when gas was near \$4.00
21 per gallon, Thornton replied "that's how I do it."

22 18. Detective Moore then asked how Thornton obtained the
23 \$80,000.00 and Thornton stated that he (Thornton) was a rapper
24 and that the money was the remainder of the funds Thornton had
25 earned from performing as a rapper at two clubs earlier in the
26 month. Thornton claimed to have made \$34,000.00 from performing
27 at the "Level 2" club in Memphis on February 13, 2011, and
28 \$61,000.00 from performing at "Club Envy" on February 20, 2011.

1 19. Thornton was carrying three cellular phones (two
2 iPhones and one Nokia model). Drug traffickers often carry
3 multiple cellular phones to avoid detection by law enforcement.
4 On the Nokia cell phone, Detective DeRuyter found the following
5 string of text messages which had been received on February 21,
6 2011:

7 1. "I'm in town and I can give u these for a better price
8 than what I told you."

9 2. "Okay I can't wait . . . Hit me up when u get here."

10 3. "I have 13 og and 8 others that are very nice"¹

11 4. "Im tryin to leave town . . . When will u be here?"

12 Detective DeRuyter showed the text messages to Thornton and told
13 Thornton that he (Detective DeRuyter) believed that the messages
14 referred to a marijuana transaction. Thornton admitted that the
15 messages were about marijuana, but claimed that the numbers
16 referred to grams, not pounds. Thornton also stated that he
17 (Thornton) was in town to buy small quantities of marijuana, but
18 that the majority of the money he (Thornton) was carrying was
19 for the purchase of a car.

20 20. A trained narcotic detection canine, "Chip," was
21 brought into the LASD office. Chip first searched the office
22 without any money in it and did not alert to anything. The
23 currency found in Thornton's carry-on bag was then hidden in the
24 office and Chip gave a positive alert upon sniffing it,

25
26
27
28 ¹ The term "OG" is commonly used to refer to "OG Kush" which is marijuana from Afghanistan. In California, this type of marijuana can sell for up to and sometimes over \$5,000.00 per pound. Accordingly, if the 21 units referenced in the text messages referred to pounds and not grams, the transaction might total approximately \$105,000.00.

1 indicating that the money had been in recent proximity to a
2 controlled substance.

3 21. The total amount of money found inside Thornton's
4 carry-on bag and on Thornton's person was later counted and
5 determined to be \$132,322.00 (i.e., the defendant currency).
6 The amount of the bulk currency, its denominations (2-\$1 bills,
7 2-\$5 bills, 8-\$10 bills, 14-\$20 bills, 31-\$50 bills and 1,264-
8 \$100 bills) and the manner in which it was secreted in
9 Thornton's shoes are indicative of narcotics related proceeds.

10 22. A subsequent criminal history check revealed that in
11 2010 Thornton was arrested in Memphis, Tennessee for possession
12 of marijuana, unlawful possession of a weapon, and possession of
13 drug paraphernalia. The Shelby County Sheriff's report revealed
14 that at the time of that arrest, Thornton was sitting in a
15 vehicle with a digital scale in his lap. Thornton was also
16 arrested and convicted for possession of marijuana in 2004.

17 23. Based on the above, plaintiff alleges that the
18 defendant currency represents or is traceable to proceeds of
19 illegal narcotics trafficking, or was intended to be used in one
20 or more exchanges for a controlled substance or listed chemical,
21 in violation of 21 U.S.C. § 841 et seq. The defendant currency
22 is therefore subject to forfeiture pursuant to 21 U.S.C. §
23 881(a)(6).

24 WHEREFORE, the United States prays that due process issue
25 to enforce the forfeiture of the defendant currency, due notice
26 be given to all interested parties to appear and show cause why
27 forfeiture should be not be decreed, that this court decree
28 forfeiture of the defendant currency to the United States of

1 America for disposition according to law, and for such other and
2 further relief as this court may deem just and proper, together
3 with the costs and disbursements of this action.
4

5
6 DATED: August // , 2011

Respectfully submitted,

7 ANDRÉ BIROTTE JR.
8 United States Attorney
9 ROBERT E. DUGDALE
10 Assistant United States Attorney
11 Chief, Criminal Division
12 STEVEN R. WELK
13 Assistant United States Attorney
14 Chief, Asset Forfeiture Section

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JENNIFER M. RESNIK
Assistant United States Attorney
Attorneys for Plaintiff
United States of America

VERIFICATION

I, Michael D. Williams, hereby declare that:

1. I am a Special Agent with the United States Drug Enforcement Administration and am the case agent for the forfeiture matter entitled United States v. \$132,322.00 in U.S. Currency.

2. I have read the above Verified Complaint for Forfeiture and know its contents. It is based upon my own personal knowledge and reports provided to me by other law enforcement agents.

3. Everything contained in the Complaint is true and correct, to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed August 10th, 2011 in Los Angeles, California.

Michael D. Williams



**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Dolly Gee and the assigned discovery Magistrate Judge is Margaret A. Nagle.

The case number on all documents filed with the Court should read as follows:

CV11- 6596 DMG (MANx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

COPY

I (a) PLAINTIFFS (Check box if you are representing yourself ☐)
 UNITED STATES OF AMERICA

DEFENDANTS
 \$132,322.00 IN U.S. CURRENCY

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

Jennifer Resnik, Assistant United States Attorney
 California Bar Number 233634
 Federal Courthouse, 14th Floor, 312 North Spring Street
 Los Angeles, California 90012
 Telephone: (213) 894-384-6595, Facsimile: (213) 894-71777

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only
 (Place an X in one box for plaintiff and one for defendant.)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☐ Yes ☒ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No

MONEY DEMANDED IN COMPLAINT: \$

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 21 U.S.C. § 881 (a)(6)

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER	LABOR
<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

FOR OFFICE USE ONLY: Case Number: CV11-06596

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
 If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
 If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER)

Date 8/11/11

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

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Attorneys for Plaintiff
 United States of America

UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 WESTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 \$132,322.00 IN U.S. CURRENCY,)
)
 Defendant.)
)

CV

CV11-06596 DMG (MANX)

NOTICE

In obedience to a Warrant of Arrest In Rem to me directed,
 in the above-entitled cause, I have, on the ____ day of _____,
 2011, seized and taken into my possession, the following
 described defendant, to wit: \$132,322.00 in U.S. Currency, for
 the cause set forth in the Complaint, to wit: violation of
 federal laws, now pending in the United States District Court for
 the Central District of California, at Los Angeles, California.

1 Amount demanded is the sum of \$-0-, plus interest and costs.

2 I HEREBY GIVE NOTICE to any person who claims an interest in
3 the above-described defendant that, pursuant to Rule G(5) of the
4 Supplemental Rules for Admiralty or Maritime Claims and Asset
5 Forfeiture Actions of the Federal Rules of Civil Procedure, said
6 person must file with the Clerk of the United States District
7 Court at Los Angeles, California and serve upon the attorney for
8 the plaintiff, a verified Claim identifying the property claimed
9 and his or her interest in the property not later than thirty-
10 five (35) days after the date of service of the Complaint, or
11 within such additional time as the court may allow; that said
12 person must file and serve an Answer within twenty-one (21) days
13 after the filing of the verified Claim; that if notice was
14 published but direct notice was not sent to said person or to
15 said person's attorney, the Claim must be filed no later than
16 sixty (60) days after the first day of publication on an official
17 internet government forfeiture site or legal notice under Rule
18 G(4)(a); and that all interested persons must file verified
19 Claims and Answers within the time so fixed; otherwise, default
20 may be entered and forfeiture ordered of the interest in the
21 defendant of any person not so complying. Applications for
22 intervention under Rule 24 of the Federal Rules of Civil
23 Procedure by persons claiming maritime liens or other interests
24 shall be filed within the time fixed by the court. A claim filed
25 by a person asserting an interest as a bailee must identify the
26 bailor, and if filed on the bailor's behalf must state the
27 authority to do so.

28 Pursuant to General Order 10-07 of the United States

1 District Court for the Central District of California, this
2 action is subject to the Electronic Case Filing ("ECF") System.
3 ECF User Registration Forms may be obtained from the Court.

4 Please check <http://www.forfeiture.gov> for a listing of all
5 judicial forfeiture notices.

6 Plaintiff's attorney is Assistant United States Attorney
7 Jennifer Resnik, 312 North Spring Street, 14th Floor, Los
8 Angeles, California 90012, (213)894-6595.

9 The custodian of the defendant U. S. Currency is the United
10 States Marshals Service, 255 East Temple Street, Suite 4128, Los
11 Angeles, California 90012, (213) 894-7904.

12
13 DATED: This ____ day of _____, 2011.

14
15 DAVID M. SINGER
16 UNITED STATES MARSHAL

17 _____
18 U.S. MARSHAL REPRESENTATIVE
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